

Anson, Robie

From: Ostenso, Nile A - DNR <Nile.Ostenso@wisconsin.gov>
Sent: Thursday, June 13, 2013 9:52 AM
To: Anson, Robie
Cc: Pfeifer, David; Mugan, Tom J - DNR
Subject: RE: Draft Pulliam PMP

Hi Robie,

We discussed the initial response of Mark Metcalf to your comments on their June 4th revised PMP. Here are the following main points we discussed yesterday or at my latest thoughts. My suggested resolutions are provided as I understand both sides.

Comment #1, is a good clarification and accepted.

Comment #2. They were not aware that the phrase “all feasible steps” was directly from the EPA rules and had to be stated this way in the PMP. The impression of this addition is that it could go beyond the understanding we generally have on the PMP as it was developed. This understanding is that the corrective action to be taken when mercury is found in the wastewater would be guided by some general factors as outlined in the June 4th PMP. These include the factors a) through d) or e). The purpose here is to have practical end points on what are acceptable feasible actions to be taken to reduce mercury. While the evaluation gives a clear outline on looking at options, it is not does not clearly state that feasible options will be taken. Yet this is the general understanding of the PMP process to reduce mercury levels as it is feasible to do so. I believe there is general agreement on action will be take when feasible to do so. To this end, please consider the following suggestion:

“If a plant process is identified to be adding mercury to the facility’s wastewater treatment system at levels above the background levels of the original source water supply, then the facility will evaluate the impact of possible actions based on expected water quality improvements at Outfall 101. The permittee will take all feasible steps to reduce the mercury in the facility’s effluent that is attributable to that plant process. This feasibility evaluation will take into consideration the following...”

Comment #3. This comment was discussed with Mark and he felt that even though redundant it would add clarity to the feasibility evaluation. I believe that Pulliam would agree to drop e).

Comment #4. As the PMP is presented as an outline, this comment is too detailed by introducing the terms “concentration and load” and this may introduce some uncertainty or restriction on the PMP process. We have specified that at mass balance of mercury in the system will be provided. The details in the PMP outline do not specify which will be used “concentration or load” at what point in the in investigation, in the evaluation of feasibility and/or in the decisions making process. It is understood that “concentration” and “load” will be used as appropriate to present PMP results. It is reasonable to expect that mass or load will be used where appropriate. Therefore, this level of clarification is not needed in the outline. I would suggest, no change is needed.

Comment #5. This comment asks for clarification on in bullet point 2 on page 2 for “criteria to be used to determine whether a specific waste stream has contributed a consistent concentration.” This point is well taken. The outline is not intended to provide the details of how data will be evaluated since the nature of the results dictate the evaluation to be used. It would be useful for the outline to state that appropriate scientific and statistical methods will be used to present PMP results.

If the above clarifications are acceptable to you, I believe they will be agreeable to Pulliam.

Thanks,



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From: Anson, Robie [mailto:anson.robie@epa.gov]
Sent: Tuesday, June 11, 2013 4:18 PM
To: Ostenso, Nile A - DNR
Cc: Singletary, Lynn L - DNR; Pfeifer, David; Wester, Barbara
Subject: RE: Draft Pulliam PMP

Hi Nile,

Thank you for forwarding these documents. I have a few thoughts:

1. I would like to verify that the permittee will analyze Hg level in the City of Green Bay water prior to any modification or treatment by the permittee (i.e. City of Green Bay water will be 'raw' when Hg level is documented).
2. Suggested language change for the end of first paragraph on page 1. Change "If a plant process is identified to be adding mercury to the facility's wastewater treatment system at levels above the background levels of the original source water supply, then the facility will evaluate the impact of possible actions based on expected water quality improvements at Outfall 101. This evaluation will take into consideration the following..." to "If a plant process adds mercury to the facility's wastewater, then the permittee will take all feasible steps to reduce the mercury in the facility's effluent that is attributable to that plant process. The permittee will evaluate the impact of possible actions based upon expected water quality improvements at Outfall 101. This evaluation will take into consideration the following..."
3. It does not seem appropriate to include consideration (e) ("...and whether the source of the mercury is from the power plant or from the water supply") in the evaluation of whether to take action to reduce Hg in the wastewater because the sentence prior (as edited in comment 2, above) establishes that a plant process has been identified as adding Hg to the facility's wastewater. Please delete bullet (e) in the middle of the first page.
4. Suggested clarification for the second sentence on p. 2. Change "If a wastewater stream is determined to be contributing mercury to the wastewater treatment facility above the background levels of the service water supply (Fox River), quarterly sampling will continue during the permit term unless or until..." to "If the concentration or load of mercury in any individual waste stream (e.g., demineralizer waste) exceeds the concentration or load of mercury in the water that is supplied to the facility to feed the processes associated with that waste stream (e.g., City of Green Bay water), then quarterly sampling will continue unless or until..."
5. The permittee commits to collecting quarterly samples of boiler sluice water, boiler seal water, boiler blow down, coal pile runoff, sulfuric acid rinse water, caustic rinse water, City of Green Bay water, and non-contact cooling water quarterly for at least two years and unless and until it meets one of three requirements. One of these requirements relies upon a finding that a waste stream "has contributed a consistent concentration of mercury to the wastewater treatment facility" after a minimum of two years of

sampling. In the PMP, please provide the criteria to be used to determine whether a specific waste stream "has contributed a consistent concentration of mercury to the wastewater treatment facility."

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From: Ostenso, Nile A - DNR [<mailto:Nile.Ostenso@wisconsin.gov>]
Sent: Wednesday, June 05, 2013 7:40 AM
To: Anson, Robie
Cc: Singletary, Lynn L - DNR; Mugan, Tom J - DNR
Subject: FW: Draft Pulliam PMP

Hi Robie,

These documents will be added to Attachment III of the fact sheet: WPSC Pulliam Fact Sheet Attachment III Alternative Hg Effluent Limit. An updated Attachment III will be forwarded shortly.

Thanks,

 *Nile A. Ostenso*

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From: Metcalf, Mark W [<mailto:MWMetcalf@integrysgroup.com>]
Sent: Tuesday, June 04, 2013 4:34 PM
To: Ostenso, Nile A - DNR
Subject: Draft Pulliam PMP

Nile,

Attached is a revised draft PMP outline for Pulliam, along with responses to EPA's comments. Please note that WPSC intends to initiate the sampling identified in the outline upon receiving approval of the final PMP from the Department. Feel free to give me a call if you have questions.

Mark

Mark Metcalf

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